

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Case No. 20-50074-(AMK)
)	
Drew N. Maddock,)	Chapter 7
)	
Debtor.)	Judge Alan M. Koschik
)	

**UNOPPOSED MOTION TO DISMISS CASE FOR CAUSE
PURSUANT TO 11 U.S.C. §707(a)**

Now comes Andrew R. Vara, the United States Trustee for Region 9, and respectfully requests this Court for an order dismissing this case pursuant to 11 U.S.C. §707(a). In support, the United States Trustee states:

1. **Overview.** On January 13, 2020, the debtor Drew N. Maddock (the “Debtor”) filed a voluntary petition for relief under chapter 7 of Title 11. After the United States Trustee and the chapter 7 trustee Kathryn A. Belfance (the “Trustee”) requested documents, the Debtor through counsel indicated that he would not be able to comply with the requests for reasons outside his personal control, and would consent to the dismissal of his case without prejudice.

2. **Jurisdiction and Standing.** The Court has jurisdiction over this matter under 28 U.S.C. §§1334(a) and (b); 28 U.S.C. §§ 157(a) and (b)(1); and 28 U.S.C. § 151. This is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A) and (B). The United States Trustee has standing to file this motion pursuant to 11 U.S.C. § 307, 11 U.S.C; § 707(a); and 28 U.S.C. § 586(a)(5).

3. **Dismissal for Cause.** Bankruptcy Code section 707(a) provides for the dismissal of a chapter 7 case for “cause.” Cause includes unreasonable delay by a debtor that is prejudicial to creditors, nonpayment of fees and charges required under chapter 123 of title 28, and the failure of the debtor to file within fifteen days information required by paragraph one of Section 521 of the

Bankruptcy Code.

4. **Conclusion.** In light of the mutual consent of the Debtor, the Trustee, and the United States Trustee, there is sufficient cause to dismiss the above-captioned chapter 7 case without prejudice. A dismissal of the case is warranted in light of the Debtor's inability to comply with applicable provisions of the Code.

WHEREFORE, the United States Trustee respectfully requests this Court to enter an order pursuant to 11 U.S.C. § 707(a) dismissing Debtor's case without prejudice and granting such further relief as may be appropriate.

Respectfully submitted,

Andrew R. Vara
United States Trustee Region 9

by: /s/ Scott R. Belhorn
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CERTIFICATE OF SERVICE

I, Scott R. Belhorn, hereby certify that the foregoing Motion was electronically transmitted on or about April 23, 2020, via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice List:

- Kathryn A. Belfance kb@rlbllp.com, oh01@ecfcbis.com
- Kathryn A. Belfance Trustee kb@rlbllp.com, oh01@ecfcbis.com
- Vance P. Truman medinaatty@vancetruman.com
- Vance P. Truman medinaatty@vancetruman.com
- United States Trustee (Registered address)@usdoj.gov

I, Scott R. Belhorn, further certify that the foregoing Motion was mailed via U.S. Post, First Class, on or about April 23, 2020, to the following:

Drew N. Maddock
384 Creekside Drive
Avon Lake, OH 44012

/s/ Scott R. Belhorn
Scott R. Belhorn